

# EXHIBIT 2

**From:** Thomas, Andrew (USANYS)  
**To:** Rothschild, Samuel (USANYS); Naftalis, Joshua (USANYS)  
**Subject:** Goel: 6/2/2023 t/c Max Nicholas [REDACTED]  
**Date:** Friday, June 2, 2023 12:19:00 PM

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Goel: 6/2/2023 t/c Max Nicholas [REDACTED]

SR, JN, AT, Isabel Wolfson

MN:

In a position to provide limited attorney proffer on behalf of [REDACTED]

- If asked about defendant's relationship with Akshay Niranjan, MN expects that [REDACTED] would say that her understanding is that Akshay and Brijesh are good friends who met in business school. They are close.
- Goel did not talk to [REDACTED] about money problems. Goel did remark, from time to time, about how particular things were expensive. For example, Goel remarked, in substance, that a car was expensive to maintain. Some time ago, Goel was doing repairs on a house. Goel said, in substance, that the repairs were expensive. [REDACTED] did not recall when that comment was, but didn't think it was 2021.
- Goel sometimes picked up dinners for her. Sometimes she paid. Sometimes they split the bills.
- [REDACTED] does not recall the approximately \$4,000 venmo transfer precisely. But she has an educated guess: She had been telling Goel that she was moving apartments and that it was expensive. This was around a time when Goel talked about leaving his wife for [REDACTED] but had not done so. She thinks that Goel was feeling guilty and sent the money because she had been talking about the costs of moving. She didn't want his pity and sent it back.
- Around the time she turned 30, [REDACTED] recalls receiving a gift of approximately \$1,000 from Goel. Around 2018.
- Some time back, Goel told [REDACTED] that he would fight the charges and was innocent.
- [REDACTED] does not wish to testify or to be involved in these proceedings.